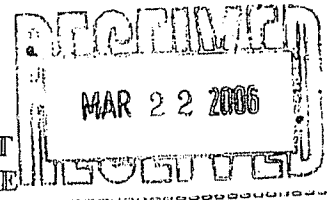


# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE



TERRY L. SNYDER,

Plaintiff,

v.

CITISTEEL USA, INC.

Defendant.

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)  
)  
)  
)  
)  
)  
)  
)  
)  
)

C.A. No. 04-970(JJF)

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF**

Plaintiff, Terri L. Snyder, by and through her attorneys, Margolis Edelstein, hereby propounds the following documents for inspection and copying to Defendant CitiSteel USA, Inc. at the offices of Young Conaway Stargatt & Taylor, LLP City of Wilmington Law Department, Louis L. Redding City/County Building, 800 North French Street, 9<sup>th</sup> Floor, Wilmington, DE 19801, in accordance with Rule 34 of the Federal Rules of Civil Procedure.

**DEFINITIONS AND INSTRUCTIONS**

A. The word "document" or "documents" as used herein is employed in the broadest possible sense under Rule 34 and shall include without limitation the original and any non-identical copy of any written, printed, typed, photographic, recorded or graphic matter, however produced or reproduced, including but not limited to, any correspondence, memoranda, notes, logs, telegrams, videotapes, audiotapes, tape recording, reports, diaries, transcripts of telephone or other conversations or any other writings of any nature whatsoever, other photographic and retrievable matter (whether taped or coded, electrostatically, electromagnetically, or otherwise) in possession, custody or control of the above-named Plaintiff and/or her attorneys.

B. "Person" refers to the plural as well as the singular of any natural person, firm, corporation, association, group, partnership or organization, unless specifically stated otherwise.

C. "You" and "your," as used in this Request, shall mean the Plaintiff, her agents, and all other persons acting on his behalf, including her attorneys.

D. If you claim that the attorney-client, attorney work product, or any other privilege applies to any document which is sought by this Request, then with respect to that document:

- (1) State the date of the document;
- (2) Identify the author(s) of the document;
- (3) Identify each and every person who prepared or participated in the preparation of the document;
- (4) Identify each and every person for whom the document was intended as either an addressee or the recipient of a copy;
- (5) Identify each and every person who has ever had possession of the document if other than the person identified in the preceding paragraph (4); and
- (6) State the factual and legal basis for the claimed privilege, or specific statutory authority which provides the claimed ground for non-production.

E. This Request shall be deemed continuing so as to require further supplemental production in the event Plaintiff, or any attorney, agent, representative or professional employed by Plaintiff in connection with this litigation obtains or discovers additional documents between the time of initial production and the time of hearing or trial.

REQUESTS

1. All audiotapes, tape recordings, notes, diaries, logs, calendars, chronologies, reports of investigation, and other documents taken, made, or prepared by you or on your behalf concerning any fact in issue in this case, including without limitation summaries, statements, or recorded interviews of any person concerning any matter in issue in the pleadings.

**RESPONSE:**

**All documents have been provided.**

2. All correspondence between you and Defendant referring or relating to any of your claims against Defendant.

**RESPONSE:**

**All documents have been provided.**

3. All correspondence between you and any other person or entity (other than privileged documents) referring or relating to any of your claims against Defendants.

**RESPONSE:**

**All documents have been provided.**

4. All documents you contend form the factual basis for or support your contention that Defendant committed any wrongful act, unlawful discrimination, unlawful harassment, and/or unlawful retaliation.

**RESPONSE:**

**All documents have been provided.**

5. All documents (including those that support any claim for punitive or liquidated damages) establishing, supporting, evidence, referring or relating to any relief you seek in your Complaint, including but not limited to, all pecuniary or financial losses such as lost

income, salary, bonus or other compensation, benefits, damages for personal or bodily injury or for emotional distress, and/or any injunctive or other non-pecuniary relief you request.

**RESPONSE:**

**All documents have been provided.**

6. All documents that you filed with, or that were sent to you by, the Equal Employment Opportunity Commission ("EEOC"), Delaware Department of Labor ("DDOL"), the DDOL's Division of Unemployment Insurance, and/or any other state, local or federal agency in connection with your claims.

**RESPONSE:**

**All documents have been provided.**

7. All documents which relate or refer to your employment with Defendant, including, but not limited to, all documents concerning any alleged changes in your working conditions, assignments, rates of pay, and evaluations, or other documents concerning your performance.

**RESPONSE:**

**All documents in Plaintiff's possession have been provided.**

8. Copies of all medical records of each physician, psychologist, psychiatrist, therapist, counselor, social worker or other health care provider for treatment, examinations or consultations with you for physical or emotional injuries allegedly sustained as a result of the facts alleged in the Complaint.

**RESPONSE:**

**All documents have been provided. Plaintiff has also signed a medical authorization for Defendant's counsel to obtain Plaintiff's medical records.**

9. All records reflecting income you received during the past seven years, whether as a result of employment or self-employment, including copies of all federal and state income tax returns with all attached schedules.

**RESPONSE:**

**Tax information for the year 2005 has been provided. Plaintiff is in the process of obtaining the remainder of her tax information, once obtained a copy will be provided as a supplement.**

10. All documents concerning your efforts to secure employment in any job or position made any time during or after your employment with Defendant, including without limitation correspondence, employment applications, resumes, curriculum vitae, or biographical sketches sent to any prospective employer, employment agency, employment search firm, recruiter, temporary staffing firm, or vocational counselor and/or all documents he received from any prospective employer or employment agency.

**RESPONSE:**

**All documents have been provided.**

11. All reports, correspondence, letters or any other documents you have sent to or received from any person you have identified as an expert in connection with the facts in issue in the pleadings, including without limitation any such documents that you contend support any allegation you make against Defendant.

**RESPONSE:**

**No experts have been retained at this time.**

12. Any reports or other documents supplied to you by any person employed by you as an expert witness in this case including any documents containing opinions and/or facts on which opinions are based concerning any aspect of the matter in litigation.

**RESPONSE:**

**No experts have been retained at this time.**

13. Copies of any report or other documents by any person you contend is an expert containing opinions and/or facts on which these opinions are based concerning any matter in issue in this case.

**RESPONSE:**

**No experts have been retained at this time.**

14. All documents identified or referred to, in your answers to Defendant's First Set of Interrogatories Directed to Plaintiff.

**RESPONSE:**

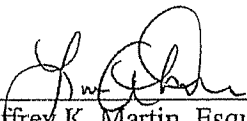
**All documents have been provided.**

15. Any other document or thing in your possession or available to you, in addition to the items specified in previous sections of this Request for Production that is relevant to any issue in the litigation, including but not limited to issues of liability and/or damages.

**RESPONSE:**

**All documents have been provided.**

MARGOLIS EDELSTEIN

  
\_\_\_\_\_  
Jeffrey K. Martin, Esquire (#2407)  
Lori A. Brewington, Esquire (#4522)  
1509 Gilpin Avenue  
Wilmington, DE 19806  
Attorneys for Plaintiff

Dated: March 20, 2006

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,

Plaintiff,

v.

CITISTEEL USA, INC.

Defendant.

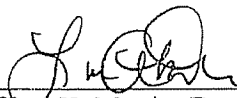
C.A. No. 04-970(JJF)

NOTICE OF SERVICE

I, Lori A. Brewington, the undersigned Counsel for Plaintiff in the above-captioned case, hereby certify that two (2) true and correct copies of the foregoing *Plaintiff's Answers to Defendant's First Request for Production of Documents* and *Certificate of Service* were sent via U.S. Mail postage pre-paid on March 20, 2006 to the following:

Molly DiBianca, Esquire  
Young Conaway Stargatt & Taylor LLP  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, Delaware 19899-0319

MARGOLIS EDELSTEIN



Jeffrey K. Martin, Esquire (#2407)  
Lori A. Brewington, Esquire (#4522)  
1509 Gilpin Avenue  
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(302) 777-4682 fax  
[jmartin@margolisedelstein.com](mailto:jmartin@margolisedelstein.com)  
Attorneys for Plaintiff

Dated: March 20, 2006



IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,	)	
	)	
Plaintiff,	)	C.A. No. 04-970(JJF)
	)	
v.	)	
	)	
CITISTEEL USA, INC.	)	
	)	
	)	
Defendant.	)	

CERTIFICATE OF SERVICE

I, Lori A. Brewington, do hereby certify that on March 20, 2006, I electronically filed the attached Notice of Service with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Molly DiBianca, Esquire  
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Attorneys for Plaintiff

Dated: March 20, 2006

# EXHIBIT B

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 A. It has been less than three years ago, and them  
2 receipts are in exact order because they came from a  
3 therapist due to CitiSteel, and that has been less than  
4 three years.

5 Q. But last year's tax returns you do not have?

6 A. Not four years, that --

7 Q. Tax returns?

8 A. No.

9 MS. BREWINGTON: Can we go off the record.

10 (Discussion off the record.)

11 MS. DIBIANCA: We are going to agree that  
12 defense will send plaintiff's counsel the proper form to  
13 request the tax returns.

14 MS. BREWINGTON: Yes.

15 MS. DIBIANCA: And that if the receipt of  
16 those tax returns is a long period of time and we would  
17 need to redepose her, depose plaintiff, that would be  
18 agreeable.

19 MS. BREWINGTON: With respect to the taxes,  
20 yes.

21 MS. DIBIANCA: Yes.

22 MS. BREWINGTON: Thank you.

23 MS. DIBIANCA: However, if she does have the  
24 taxes and we can save the effort of making those requests

# EXHIBIT C

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CURTIS J. CROWTHER

OF COUNSEL  
STUART B. YOUNG  
EDWARD B. MAXWELL 2ND

June 5, 2006

BY EMAIL AND REGULAR MAIL

Lori Ann Brewington, Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806

Re: Snyder v. CitiSteel

Dear Lori:

During Ms. Snyder's deposition, she stated that she had the following documents in her possession which have not been produced:

1. Documents regarding job searches, including but not limited to job search faxes and documents sent to, or received from, internet employment services such as CareerBuilders.com and Monster.com.
2. Receipts from Cynthia Wright and other medical providers for the past 10 years.
3. Paystubs from previous employers within the past 10 years, including but not limited to, American Flagging Company, Delaware Park, and Pyramid.
4. Documents sent to, or received from schools and/or training institutes, including but not limited to Dawn Institute and American Driving Academy.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Lori Ann Brewington, Esquire

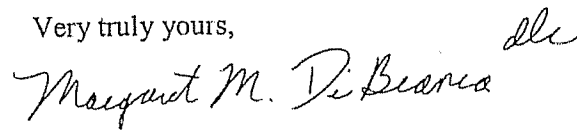
June 5, 2006

Page 2

Please have Ms. Snyder bring those documents with her to the deposition tomorrow. In addition, we are requesting that Ms. Snyder produce the benefits package from The Skelly Group as soon as she receives it.

This will also confirm that Ms. Snyder will execute IRS Form 4056, so that we can request copies of her income tax returns for the years 1998 to 2005. Since the tax returns will most likely be received after the discovery cutoff, we have agreed to take Ms. Snyder's deposition regarding information obtained from her income tax returns after the discovery cutoff.

Very truly yours,

A handwritten signature in cursive script that reads "Margaret M. DiBianca". To the right of the signature is a small, stylized monogram or flourish.

Margaret M. DiBianca

MMD:y

# EXHIBIT D

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1       freaked out on him --

2           Q.     When was that?

3           A.     Started in January. I had enough. He backed  
4       away. So it was like Mr. Ford was interacting with me  
5       even more so.

6                     Now, but please forgive me, as far as  
7       inventory is concerned, Ford, I worked directly with  
8       Carmella and Ford a lot on the inventory, from the get  
9       go. Mainly more so, you know, of course than Mr. Harris.

10          Q.     Okay. And then before you went to CitiSteel  
11       where did you work?

12          A.     Well, I always stayed certified as a flagger,  
13       flagger for a construction company. Excuse me. I don't  
14       recall.

15          Q.     The last job you had prior to CitiSteel?

16          A.     I don't recall. No.

17          Q.     How about in the previous five years before  
18       CitiSteel?

19          A.     Oh, a bank.

20          Q.     Okay.

21          A.     A bank. April, I think.

22          Q.     That would have been April before you went to  
23       CitiSteel?

24          A.     Yes.



Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 Q. Do you know the name of the bank?

2 A. No.

3 Q. Any other places that you recall working prior to  
4 CitiSteel?

5 A. Oh, throughout my life?

6 Q. No. Just the past maybe five years.

7 A. Delaware Park. I worked at Delaware Park.

8 Q. Doing what?

9 A. I was -- the judges that judge the horse racing,  
10 they are called the stewards. I worked -- I was their  
11 secretary.

12 Q. Was that full-time work?

13 A. Yes, ma'am.

14 Q. Do you have any recollection as to when that  
15 would have been?

16 A. Actually, they called me on a Saturday morning,  
17 it was May the 11th of '96, the day after my graduation  
18 of the automated accounting. Well, the graduation  
19 ceremony may have been a little bit before, but it was --  
20 something happened on May 10th. It may have been that  
21 graduation ceremony.

22 And I couldn't believe somebody called on a  
23 Saturday to interview me, but, see, I wasn't aware, a  
24 Saturday for the horses at Delaware Park is like a Monday

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 for the rest of society. And they called me in for an  
2 interview for that day. And I went.

3 And I stayed there until -- did you want to  
4 know this?

5 Q. Yes, please.

6 A. -- November of '98.

7 Q. Why did you leave Delaware Park?

8 MS. BREWINGTON: Objection, relevance.

9 MS. DIBIANCA: There is no objection for  
10 relevancy for depositions purposes, Lori.

11 MS. BREWINGTON: We have to preserve the  
12 record.

13 MS. DIBIANCA: No, you don't. If you want  
14 me to pull the local rule, I'll be happy to do that.  
15 There is no objection for relevancy in deposition  
16 testimony.

17 MS. BREWINGTON: I object. Go ahead. You  
18 can certainly answer.

19 THE WITNESS: Excuse me for saying. One day  
20 I was coming down the hall -- see, I could have came into  
21 my office -- I work side by side with a secretary that  
22 had been the judge's secretary for over 13 years.

23 Now, I could have came in this way  
24 (indicating) where my door, my desk is right here at this

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 office. Janet and I, we had two desks in our office, and  
2 then our office connected to the stewards.

3 Well, I came in this way (indicating). As I  
4 was coming down the little corridor, Janet walked out of  
5 the steward's office with a gold piece of paper. And by  
6 the time she came across, by the time I got down the  
7 little corridor, the gold piece of paper was on my desk.

8 And I said, "What is this?" And she said,  
9 "I don't know, but it better not be a merit increase."  
10 And I said, "What?"

11 And so I went to the director of finance,  
12 Mr. John Rooney, and I said, "Would you please tell me  
13 what this is?" And he said, "Yes, I gave you a raise."

14 And I said, "Wait a minute," I said, "the  
15 stewards haven't had a raise." I said, "Janet is upset."  
16 I said, "She hasn't had a raise in 13 years." I said, "I  
17 don't want the raise."

18 He said, "You got the raise. You are going  
19 to take it, and it is none of Janet's business and she  
20 shouldn't have been snooping on your desk."

21 Janet kind of quit talking to me. Things we  
22 should have interacted with on a daily work basis, we had  
23 to tend to the jockeys, the horse owners, the trainers  
24 and so forth, and so, you know, slowly but surely, I

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 just, I didn't want to be there anymore, basically. They  
2 were treating me different. And I felt guilty for having  
3 a raise and she didn't get one. So...

4 Q. Did you resign?

5 A. Actually, no.

6 Q. What happened?

7 A. I slowly but surely quit going there. I didn't  
8 want to be there anymore. So...

9 Q. Like did you just stop going?

10 A. I stopped going. And then they officially  
11 terminated me, yes.

12 Q. Okay. So when you said you didn't resign, you  
13 mean you didn't give a resignation notice or something?

14 A. No.

15 Q. And then after that where did you go?

16 A. I don't recall.

17 Q. That would have been November 1998; is that what  
18 you said?

19 A. Yes.

20 Q. That's the year that you had your car accident,  
21 correct?

22 A. I think it -- yes, I think may have -- it was in,  
23 yes, it was in '98, I'm pretty sure. And may have been  
24 right after or right before, yes.

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 Q. Right before or right after what?

2 A. Delaware Park.

3 Q. Did it prevent you from working, the car  
4 accident?

5 A. Forgive me. When I worked at Delaware Park, I  
6 was driving one of my father's black Cadillacs. When the  
7 kids hit me, I then -- he gave me a blue Oldsmobile. So  
8 I actually still have the registration and stuff from the  
9 Oldsmobile. I could find out for you.

10 So give or take, as far as that last car  
11 accident, which that should also be in my medical records  
12 as well. When that happened, when I was at Delaware Park  
13 I had a black Cadillac. When the kids hit me it totaled  
14 my Oldsmobile. So it was after Delaware Park,  
15 definitely, because that's when I had the Oldsmobile.

16 Q. Your car accident must have been in 1999?

17 A. I'm pretty sure it was the end of '98. I didn't  
18 go long without a vehicle. It could have been the  
19 beginning of '99. So forgive me for that.

20 Q. That's fine. No, that's fine.

21 A. Yes.

22 Q. So did the car accident prevent you from working?

23 A. Well, I don't recall. I know I was in pain, a  
24 lot of pain for awhile, the very beginning. Eventually

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 you learn to live with pain.

2 Q. Was there ever a time that you didn't hold a job?

3 A. That I did not?

4 Q. Yes.

5 A. What do you mean?

6 Q. Did you not work?

7 A. Sure. In between.

8 Q. I don't mean for a period of a week, but say a  
9 period of more than a month.

10 A. Yes.

11 Q. When was that?

12 A. Such as April to August, in between the bank and  
13 CitiSteel. Such as --

14 Q. Go ahead.

15 A. Such as that.

16 Q. I thought you were going to say such as something  
17 else and give another example. But you definitely worked  
18 after Delaware Park; is that correct?

19 A. Yes.

20 Q. Do you recall where that was, where your  
21 employment was after Delaware Park?

22 A. Bank. I answered that.

23 Q. Oh, I'm sorry.

24 A. That's okay.

Snyder v. Citi Steel, USA, Inc.  
Snyder, Terry L. C.A. # 04-970-JJF May 31, 2006

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1 Q. When was the bank?

2 A. After Delaware Park.

3 Q. When?

4 A. I don't recall. It is on record too probably.

5 Right there.

6 Q. I'm just asking you. Did you go from --

7 A. Well, I already answered that.

8 Q. Could you repeat it again for me?

9 A. Can't we look it up again like we did earlier?

10 MS. BREWINGTON: I'm going to object on the  
11 grounds of asked and answered. You can go ahead.

12 Q. I just want to clarify. I understood that you  
13 testified that you went to work at the bank prior to  
14 CitiSteel.

15 A. No.

16 Q. That's incorrect.

17 A. That's incorrect.

18 Q. So correct me.

19 A. Or -- yes, prior, before.

20 Q. Yes.

21 A. Can we look it up?

22 Q. I would like you to just answer the question as  
23 to what your sequence of employment is.

24 A. The bank -- yes, but I think we should only ask a

Snyder v. Citi Steel, USA, Inc.  
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1 question once and then --

2 Q. But it hasn't been answered.

3 A. Well, yes, it has, because it is on here. So if  
4 you are remembering what I already told you, then it has  
5 been answered. Yes, yes. I'm assuming you are correct.  
6 So --

7 Q. I don't want to assume I'm correct. I don't know  
8 what the answer is.

9 A. Well, if it is prior, you have already asked it  
10 once, though. That's how you already knew the answer to  
11 it.

12 Q. Ma'am, I'm going to ask you on the record to  
13 please --

14 A. Which you already did, yes, prior.

15 Q. I'm going to ask you on the record to please  
16 state for me your employment history.

17 A. I do not remember. Bank prior. No. Prior to --  
18 prior to CitiSteel, after Delaware Park. That's what I  
19 was --

20 Q. That makes sense. That is what I called  
21 employment history. Delaware Park, which we established  
22 you left November 1998. Is that correct?

23 A. Yes.

24 Q. You started in CitiSteel in August of 2001. Is



Snyder v. Citi Steel, USA, Inc.  
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1 that correct?

2 A. Yes.

3 Q. And the bank was in between?

4 A. Yes.

5 Q. The bank's name you do not recall; is that  
6 correct?

7 A. Yes.

8 Q. So you worked at the bank for over two years; is  
9 that correct?

10 A. I do not recall.

11 Q. You do not recall where you worked?

12 A. No, no.

13 Q. Is there any reason why you would not recall  
14 where you worked for a period of two years?

15 A. But you are more than welcome to look it up.

16 Q. I'm asking you.

17 A. I don't remember. I was not there for two years,  
18 though, no.

19 Q. Okay. Where else were you other than there, the  
20 bank, for two years?

21 A. Nowhere. I don't --

22 Q. You didn't work?

23 A. I don't think so. I am not sure.

24 Well, there was two banks I actually worked

Snyder v. Citi Steel, USA, Inc.  
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1 at.

2 Q. During the same period?

3 A. Yeah. Yes.

4 Q. What was your salary when you started full-time  
5 at CitiSteel?

6 A. Well, I actually lowered it by a couple cents,  
7 not realizing. When I started the temp service I think I  
8 started at 12 or 12 something, and once I became an  
9 official employee, they asked me what I wanted, and I, I  
10 don't know how or why I did that, and I said 11.50, and  
11 I'm pretty sure that that is what they started me at, was  
12 11.50.

13 Q. That was an hourly rate?

14 A. Yes, ma'am.

15 Q. Who interviewed you for the job? Was it someone  
16 at Bernard or someone at CitiSteel?

17 A. Well, I was registered with Bernard, and Mike --  
18 I do not recall his last name, but he used to run the  
19 little HR building where Jim Ryan's office was.  
20 McConnahan, maybe something like that. Unless there is  
21 another McConnahan up there and that just popped into my  
22 head. He did, he gave me some tests.

23 Because a lot of people use Excel nowadays,  
24 which I know Lotus and Excel. So that was part of

# EXHIBIT E

Snyder v. Citi Steel, USA, Inc.  
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1 A. Yes.

2 Q. Okay.

3 A. Forgive me.

4 Q. That's okay. Then the next employer you listed  
5 is First USA. So would that have been the second bank  
6 that you mentioned?

7 A. Yes.

8 Q. And then Delaware Park is also listed on here,  
9 which you did mention previously.

10 A. Yes.

11 (Discussion off the record.)

12 Q. So Delaware Park Racetrack, you had mentioned  
13 that earlier, and your last date of employment there is  
14 listed as November 1998, which you did testify to  
15 earlier. But then First USA it says you started in April  
16 2001 until August of 2001. Is that what it says here?

17 A. Yes. I had taken a -- it was located on almost  
18 Greenhill and 4th Street. I had taken a class there as  
19 well, and they actually got me offered -- First USA  
20 offered us students interviews, and as soon as my class  
21 was over I started immediately with First USA. I  
22 remember that, yes.

23 Q. You were unemployed from 1998 to 2001, November  
24 1998?

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1 A. Well, no. I don't know what I did, but, no, I  
2 wasn't just completely unemployed, no. I do not recall.

3 I know I took a class in the beginning of  
4 2001, because that school --

5 Q. What is the school's name?

6 A. I do not recall.

7 Q. What was the program for?

8 A. CP -- I think the school is still there. It is  
9 actually, it is at the very end of 4th Street on the  
10 left. The next road down intercepts with Greenhill, I  
11 think. It was letters, the name of the school was  
12 actually letters.

13 Q. How long was the program?

14 A. A couple months.

15 Q. And you don't know what kind of class you took?

16 A. No. It was a mixture of stuff. At one point  
17 they even -- at one point they wanted to, which I already  
18 knew, I had plenty of business attire, but for some  
19 people who had never applied for an interview and so  
20 forth, they, you know, would show people how to sit and  
21 behave even during the interview.

22 Please forgive me. I can't remember  
23 anything about it. But I remember that that school got  
24 me an interview with First USA.

# EXHIBIT F

**Agostini, Betty**

---

**From:** Lori Brewington [lbrewington@margolisedelstein.com]  
**Sent:** Tuesday, September 19, 2006 3:52 PM  
**To:** DiBianca, Margaret  
**Subject:** RE: Terry Snyder's deposition

**Follow Up Flag:** Follow up  
**Flag Status:** Red

Molly,  
Terry Snyder is ill and will not be able to attend her deposition scheduled for tomorrow. Additionally, I had planned to meet with her this afternoon to review the tapes and to have her sign the verification form but unfortunately, she was not able to come in. I am in the process of preparing for a trial and writing a brief that is due next week. We may have to reschedule her deposition for the second week in October.  
Your thoughts?

Lori

Lori A. Brewington, Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806  
(302)777-4680  
(302)777-4682 fax

>>> "DiBianca, Margaret" <mdibianca@ycst.com> 9/18/2006 10:38:56 AM  
>>>  
I had still planned on it. Will you be providing any more discovery responses prior to then?

Margaret M. DiBianca, Esq.  
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The Brandywine Building  
1000 West Street, 17th Floor  
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-----Original Message-----

From: Lori Brewington [mailto:lbrewington@margolisedelstein.com]  
Sent: Monday, September 18, 2006 10:23 AM  
To: DiBianca, Margaret  
Subject: Terry Snyder's deposition

Molly,  
Are we still on for Terry Snyder's deposition on Wednesday, Sept. 20 at 1:00 p.m. Please advise. Thanks.

Lori

Lori A. Brewington, Esquire

# EXHIBIT G



**Agostini, Betty**

---

**From:** Lori Brewington [lbrewington@margolisedelstein.com]  
**Sent:** Monday, September 25, 2006 10:25 AM  
**To:** DiBianca, Margaret  
**Subject:** RE: #5525860, v1 <DB02> - [Disc.] (MDIBI toBrewington)Ltr.rediscovery - WorkSite Acrobat Integr

Molly,  
Tim has graciously agreed to attend!!! I'm so excited. He'd like to start the deposition at 9:00am. Thanks.

Lori

Lori A. Brewington, Esquire  
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>>> "DiBianca, Margaret" <mdibianca@ycst.com> 9/25/2006 10:16:45 AM  
>>>  
Wednesday would be best for me. I expect it to take a half day.

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-----Original Message-----

From: Lori Brewington [mailto:lbrewington@margolisedelstein.com]  
Sent: Monday, September 25, 2006 10:15 AM  
To: DiBianca, Margaret  
Subject: RE: #5525860, v1 <DB02> - [Disc.] (MDIBI to Brewington)Ltr.rediscovery - WorkSite Acrobat Integr

Molly,  
How long will this deposition take? I'm trying to get Tim Wilson to attend. It looks like he's available Wednesday or Friday.

Lori

Lori A. Brewington, Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806  
(302)777-4680  
(302)777-4682 fax

>>> "DiBianca, Margaret" <mdibianca@ycst.com> 9/25/2006 9:59:44 AM >>>  
Lori,

We really need to discuss this. You are leaving me with only 4 weeks before the SJ opening brief is due. There is no one from your office available until October 9?

~Molly

Margaret M. DiBianca, Esq.  
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-----Original Message-----

From: Lori Brewington [mailto:lbrewington@margolisedelstein.com]  
Sent: Monday, September 25, 2006 9:56 AM  
To: DiBianca, Margaret  
Subject: RE: #5525860, v1 <DB02> - [Disc.] (MDIBI to Brewington) Ltr.rediscovery - WorkSite Acrobat Integr

Molly,  
I can't seem to find coverage for the deposition. Could you provide some available dates after October 9?

Lori

Lori A. Brewington, Esquire  
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>>> "DiBianca, Margaret" <mdibianca@ycst.com> 9/25/2006 9:51:08 AM >>>  
Thanks, I'll make that correction now. Any word on the rescheduled dep?

Margaret M. DiBianca, Esq.  
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-----Original Message-----

From: Lori Brewington [mailto:lbrewington@margolisedelstein.com]  
Sent: Monday, September 25, 2006 9:49 AM

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September 27, 2006

**BY E-MAIL & U.S. MAIL**

Lori A. Brewington, Esq.  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, Delaware 19806

Re: Snyder v. CitiSteel

Dear Lori:

Per our telephone discussion this morning, Plaintiff's deposition will be noticed for Friday, September 29, 2006, beginning at 9:00 a.m., to be held in the offices of YCS&T.

I am sure that it goes without saying that this morning's last minute cancellation of Ms. Snyder's deposition, five minutes prior to the scheduled starting time, has caused Defendant serious concern. As you know, this is the second time in less than two weeks that Ms. Snyder has become unavailable for a properly noticed deposition. She had been properly noticed for her deposition on September 20, 2006, as well, but that was cancelled at 4:00 p.m. on the eve of the deposition.

On Friday, Ms. Snyder will be expected to bring with her to the deposition a copy of a signed copy of the Release required by Dr. Privette's office. If she does not bring the Release, I will provide her with a copy and will expect her to execute it prior to any testimony.

Hopefully, this will enable us to forward the Release to Dr. Privette's office and ask for an expedited return of the documents. If we receive the records prior to the end of the

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Lori A. Brewington, Esq.

September 27, 2006

Page 2

deposition and, assuming the documents are of a reasonable number, I will review them during a break and proffer any questions I may have about them during the same deposition.

If, however, we are unable to obtain the records on Friday while the deposition is ongoing or if, for some reason, the records cannot be reviewed during a break, Defendant reserves the right to re-call Ms. Snyder for another deposition, limited to the information arising from such records. If, of course, you are able to provide the executed release prior to Friday, I will make every effort to obtain the records in time to prevent the necessity of having to recall your client for another day of testimony. Although we agreed to this method this morning via telephone, please inform me immediately of any objections you should have.

We also agreed this morning that Ms. Snyder has completed her review of the tape transcripts and you expect to meet with her to discuss them on Friday afternoon, following her deposition, as well as to have her sign the outstanding Verification form absent from Plaintiff's Responses to Defendant's Second Set of Interrogatories. Based on our conversation, then, I will expect both the transcript edits and the signed Verification by the end of the day on Friday.

Should Ms. Snyder be unwilling to execute the Release or, in any other way, fail to cooperate during the deposition or otherwise, Defendant stands fully prepared to move the Court to dismiss her claims pursuant to Rules 37 and 41 of the Federal Rules of Civil Procedures, as well as to issue an Order awarding Defendant costs and fees for its time and expense caused by Ms. Snyder.

Please contact me with any changes or concerns.

Sincerely,



Margaret M. DiBianca

MMD:y

# EXHIBIT I

**Agostini, Betty**

---

**From:** Renee Taylor [rtaylor@margolisedelstein.com]  
**Sent:** Thursday, September 28, 2006 3:06 PM  
**To:** DiBianca, Margaret  
**Subject:** Snyder v. CitiSteel

We have spoken to Terri Snyder. The deposition scheduled for tomorrow is on.

Thank you,

Renee

# EXHIBIT J



**Agostini, Betty**

---

**From:** Timothy Wilson [twilson@margolisedelstein.com]  
**Sent:** Monday, October 02, 2006 10:25 AM  
**To:** DiBianca, Margaret  
**Cc:** Lori Brewington  
**Subject:** Re: Snyder v. CitiSteel

Molly,  
I just talked to her. She is going to the doctor today and he is going to runs some tests on her. She still is not feeling well. I told her to talk to her doctor today to get his opinion on whether she'll be able to proceed this week. She will contact me today or early tomorrow and I'll get back to you on. She told me to express her deepest apologies to you.

Tim

Timothy J. Wilson, Esq.  
MARGOLIS EDELSTEIN  
1509 Gilpin Avenue  
Wilmington, Delaware 19806  
Telephone: (302) 777-4680  
FAX: (302) 777-4682  
Email: twilson@margolisedelstein.com

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>>> "DiBianca, Margaret" <mdibianca@ycst.com> 09/29 5:58 PM >>>  
Tim (or Lori),

Were you able to reach Ms. Snyder today re: rescheduling her deposition?

Thank you,

Molly

Margaret M. DiBianca, Esq.  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899-0391  
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# EXHIBIT K

**DiBianca, Margaret**

---

**From:** DiBianca, Margaret  
**Sent:** Thursday, October 05, 2006 12:07 PM  
**To:** 'Lori Brewington'  
**Subject:** RE: Terry Snyder deposition

Lori,

What is the status of the following: Kalstein release, the transcripts, and the documentation for her cancellations last week?

My first available dates are the 16th and 17th.

Margaret M. DiBianca, Esq.  
Young Conaway Stargatt & Taylor, LLP  
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-----Original Message-----

From: Lori Brewington [mailto:lbrewington@margolisedelstein.com]  
Sent: Thursday, October 05, 2006 11:37 AM  
To: DiBianca, Margaret  
Subject: Terry Snyder deposition

Molly,  
I apologize for the delay. I have been in trial this week. Terry is available for depo #3 on October 10, 11 or 13. How's your availability?

Lori

Lori A. Brewington, Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806  
(302)777-4680  
(302)777-4682 fax

# EXHIBIT L

Snyder  
Terry L. Snyder, Volume 3

v.  
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CitiSteel, USA, Inc.  
October 16, 2006

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1 today is for the last -- we've had a few cancellations  
2 for today. Were you able to go to the doctor for any  
3 of those cancellations?

4 A. What does that mean?

5 Q. Did you -- when you canceled the last  
6 deposition --

7 A. Oh, yes. I apologize. Yes, yes.

8 Q. You did go to the doctor's?

9 A. Oh, yes.

10 Q. When did you go to the doctor's?

11 A. It was on a Monday. I was going to go to the  
12 Emergency Room. Well, I asked my cousin that I do  
13 everything for. I do anything for anybody. She never  
14 showed up. She was going to drive me because I was  
15 scared to drive. I couldn't drive. And I was going  
16 to go to the Emergency Room. And actually the more I  
17 thought about it, I was glad she didn't show up  
18 because I probably wouldn't have survived in an  
19 Emergency Room. I don't know if you hear me over here  
20 moaning and groaning and just, you know, my whole head  
21 neck and head is hot. I think you can see it in my  
22 face. You know how you don't feel good it comes out  
23 of you. I don't feel good now, either. They were  
24 really bad. I didn't want to move my jaw. I went in

Snyder  
Terry L. Snyder, Volume 3

v.  
C.A. # 04-970 (JJF)

CitiSteel, USA, Inc.  
October 16, 2006

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1 the doctor's office. I drove myself on, it was a  
2 Monday, I guess it was. Whatever date that was.

3 Q. I don't know the date either. Was that  
4 Dr. Goodman's office?

5 A. It was his office. But I -- I wanted -- he  
6 wasn't in. I wanted to see any doctor. Or did I go  
7 on that Saturday? No. I seen Christine something.  
8 She works with him. She's one of the doctors in his  
9 office.

10 Q. Okay. Did she give you any medicine or  
11 prescription?

12 A. Yeah.

13 Q. What did she give you?

14 A. She said that she thinks that I could be  
15 getting them from sinus, you know, maybe some type of  
16 sinus infection --

17 Q. Okay.

18 A. -- or allergies. She gave me nose spray and  
19 Claritin D, which I just took another one today and I  
20 just felt ... see anything working. She didn't X-ray  
21 my head. That's what I actually wanted, you know.

22 MS. DiBIANCA: That's all I have. We're  
23 done for today.

24 (Deposition concluded at 12:04 p.m.)

# EXHIBIT M

YOUNG CONAWAY STARGATT & TAYLOR, LLP

MARGARET M. DiBIANCA  
DIRECT DIAL: 302-571-5008  
DIRECT FAX: 302-576-3476  
mdibianca@ycst.com

THE BRANDYWINE BUILDING  
1000 WEST STREET, 17TH FLOOR  
WILMINGTON, DELAWARE 19801  
  
P O BOX 391  
WILMINGTON, DELAWARE 19899-0391

(302) 571-6600  
(302) 571-1253 FAX  
(800) 253-2234 (DE ONLY)  
www.youngconaway.com

October 16, 2006

**VIA UNITED STATES MAIL**

Lori A. Brewington Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806

Re: Snyder v. CitiSteel USA Inc., C.A. No. 04-970-JJF

Dear Ms. Brewington:

Enclosed please find the two invoices from Wilcox & Fetzer reflecting the cancellation charges incurred for Ms. Snyder's cancelled depositions on September 27 and September 29, 2006. Young Conaway Stargatt & Taylor, LLP has remitted payment in the full amount to Wilcox & Fetzer. Please tender payment made out to our office and forward to my attention.

Thank you in advance for your prompt attention to this matter.

Sincerely,



Margaret M. DiBianca

MMD:y  
Enclosures



 ENTERED

**Wilcox & Fetzer, LTD.**  
Registered Professional Reporters  
1330 King Street  
Wilmington, DE 19801  
(302) 655-0477 Fax: 655-0497  
FTID# 51-0318885

Margaret M. DiBianca, Esquire  
Young, Conaway, Stargatt & Taylor  
Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801

October 2, 2006

**Invoice#** 20063839

**Balance:** \$205.00

**Re:** Snyder v. CitiSteele, USA Inc.  
04-970  
on 09/29/06 by Julie Parrack

***Invoicing Information***

<u>Charge Description</u>	<u>Amount</u>
DEPOSITION OF: Terry Snyder	
WAITING TIME/CANCELLATION FEE	205.00

(2<sup>nd</sup> Cancellation = \$150.00; 1/2 hr. waiting time = \$55.00)

**P l e a s e   R e m i t   - - - >   Total Due:   \$205.00**

*Please make checks payable to Wilcox & Fetzer, LTD  
Terms Net 30 Days*



**Wilcox & Fetzer, LTD.**  
*Registered Professional Reporters*  
1330 King Street  
Wilmington, DE 19801  
(302) 655-0477 Fax: 655-0497  
FTID# 51-0318885

Margaret M. DiBianca, Esquire  
Young, Conaway, Stargatt & Taylor  
Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801

October 2, 2006

**Invoice#** 20063840

**Balance:** \$75.00

**Re:** Snyder v. Citisteeel  
04-970  
on 09/27/06 by Eleanor Schwandt

***Invoicing Information***

<u>Charge Description</u>	<u>Amount</u>
DEPOSITION OF: Terry Snyder	
CANCELLATION FEE	75.00

**P l e a s e   R e m i t   - - - >   Total Due:   \$75.00**

*Please make checks payable to Wilcox & Fetzer, LTD*  
*Terms Net 30 Days*

# EXHIBIT N

YOUNG CONAWAY STARGATT & TAYLOR, LLP

MARGARET M. DiBIANCA, ESQ.  
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(800) 253-2234 (DE ONLY)  
www.youngconaway.com

November 1, 2006

**BY FACSIMILE & U.S. MAIL**

Lori A. Brewington Esquire  
Margolis Edelstein  
1509 Gilpin Avenue  
Wilmington, DE 19806

Re: Terri L. Snyder v. CitiSteel U.S.A., Inc.

Dear Ms. Brewington:

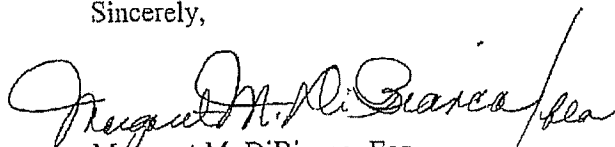
I again write to you regarding several outstanding issues in the above-referenced matter. On October 16, I forwarded copies of two invoices from Wilcox & Fetzer. These invoices were for cancellation fees charged for Ms. Snyder's two last-minute cancellations for depositions on September 27, 2006 and September 29, 2006. You previously agreed that your office would pay these costs. My office has paid the invoices but have not received reimbursement from Margolis Edelstein.

Defendant also waits to receive Plaintiff's responses to the most recent interrogatories in which Plaintiff was asked to identify the reason for separation from each employer subsequent to her employment at CitiSteel. My most recent request for this information was via letter on October 19, 2006, to which I have received no response.

Finally, as you know, Defendant still awaits Plaintiff's edits to the transcriptions of the tapes. I initially forwarded the transcripts to your office on August 15, 2006. Now, two and half months later, there has still been no response. In late September you assured me that you would produce the transcripts no later than October 6, 2006. Then, on October 5, 2006, you said that you would check the status of the transcripts. At Ms. Snyder's deposition on October 16, 2006, she personally assured me that she would review the transcripts without delay.

Please advise me of your intent regarding these issues. I will expect payment of the invoices on or before Wednesday, November 8, 2006.

Sincerely,

  
Margaret M. DiBianca, Esq.